



JEFFERSON COUNTY DEPARTMENT OF HEALTH

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Environmental Health Services

Wayne Studyvin, PE, MSCE, Director

Frank Phillips, PE, Assistant Director

April 7, 2006

Certified Mail

Return Receipt Requested

Mr. Mark Poling
Manager, Engineering Environmental Compliance
ABC Coke
P.O. Box 10246
Birmingham, AL 35202

Dear Mr. Poling:

Re: Alternative method for 40 CFR 63.7334(a)(1)-(6) for 5 and 6 batteries

The Department has reviewed and observed ABC Coke's alternative method for 5 and 6 batteries to comply with 40 CFR 63.7334 (a)(1)-(6) and has accepted this plan in accordance with 40 CFR 63.7334(a)(7). ABC shall follow the work practices spelled out in 40 CFR 63.7291 for correcting a green oven regardless of the method used. Further, the alternative method will only be used when 40 CFR 63.7334(a)(1)-(6) cannot be performed. In accordance with ABC Coke's alternative plan, the Department requires the following conditions:

- 1) ABC Coke will train battery employees to use the alternative method,
- 2) ABC Coke shall submit to the Department the alternative method in writing, as well as allow the Department to observe the training of plant personnel, and
- 3) ABC will follow 40 CFR 63.7291 work practices for any oven determined to be green by this alternative method.

Finally, ABC must have all conditions in place by April 14, 2006, in order to be in compliance with Subpart CCCCC.

If you have any questions regarding the content of this letter, please contact Mr. Jason Howanitz at 930-1284.

Sincerely,

Wayne Studyvin, Director
Environmental Health Services

WS/jh

PROTECTING **YOUR** HEALTH